

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenor/Plaintiff.

**PLAINTIFFS' CROSS-EXAM EXHIBIT LIST  
FOR AUGUST 12, 2025 HEARING**

On Monday August 4, 2025, Defendants Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security and Todd Lyons, in his official capacity as Acting Director of the United States Immigration And Customs Enforcement (the “Federal Defendants”) and Kevin Guthrie, in his official capacity as Executive Director of the

Florida Division of Emergency Management (“FDEM”) disclosed three witnesses they intend to call in this matter. Plaintiffs, through undersigned counsel, hereby file a list of additional exhibits that they may use during cross-examination when the Injunction Hearing resumes on August 12, 2025 given the Federal Defendants and FDEM’s witness disclosure. Plaintiffs reserve the right to add exhibits depending on the substance of the witnesses’ testimony, and to provide rebuttal evidence:

**CROSS-EXAM EXHIBIT LIST**

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| 98  | Florida State of Emergency Response Team (SERT) South Florida Detention Facility Continuity of Operations Plan  |  |
| 99  | Resume of Mike Radford, PE (SEC Engineers, Dillon Reio’s colleague)   |  |
| 100 | 2015.05.18 Miami-Dade County, Miami International Airport – Miami Dade Aviation Department – Operational Directive No. 15-02, effective June 2, 2025 (Purpose: To establish policy and procedures regarding the use of the Dade-Collier Training & Transition Airport (TNT))  |  |
| 101 | Noem image – “over 10 miles of Everglades on all sides of facility” IMG_1076  |  |
| 102 | “Operations at [the Facility] are ongoing and deportations continuing,” @GovRonDesantis, X (8/7/25 4:53 P.M.)   |  |
| 103 | Photographs of new fencing on access road   |  |
| 104 | August 7, 2025 Statement of Miami-Dade County Mayor Daniella Levine Cava  |  |
| 105 | Link to July 25, 2025 press conference, “Deportation flights from Florida’s ‘Alligator Alcatraz’ detention center have begun, DeSantis says,” <a href="https://www.wilx.com/2025/07/25/deportation-flights-floridas-alligator-alcatraz-detention-center-have-begun-desantis-says/">https://www.wilx.com/2025/07/25/deportation-flights-floridas-alligator-alcatraz-detention-center-have-begun-desantis-says/</a> |  |
| 106 | Stephen Miller, White House Deputy Chief of Staff for Policy and Homeland Security Advisor, July 16, 2025 Fox News interview, <a href="https://url.us.m.mimecastprotect.com/s/fPTWC68pgltYMk4fpfYi5iUWc?domain=x.com">https://url.us.m.mimecastprotect.com/s/fPTWC68pgltYMk4fpfYi5iUWc?domain=x.com</a>   |  |
| 107 | SERT Order No. PO-010162 (\$1,180,000)   IRG Global EM  |  |
| 108 | SERT Order No. PO-010177 (\$325,800)   Innovative EM  |  |
| 109 | PO-010174 (\$380,000)   AC Disaster   |  |
| 110 | SERT Order No. PO-010181 (\$25,594)   Trulight LLC  |  |
| 111 | SERT Order No. PO-010182 (\$15,699.35)   CDW Government   |  |

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| 112 | SERT Order No. PO-010183 (\$3,358,700)   Granny's Alliance   |  |
| 113 | SERT Order No. PO-010201 (\$24,740)   WeatherSTEM Inc.   |  |
| 114 | SERT Order No. PO-010199 (\$848,420.22)   Public Safety Solutions  |  |
| 115 | SERT Order No. PO-010200 (\$47,730)   Williams Communications  |  |
| 116 | SERT Order No. PO-010198 (\$52,010)   Lemoine CDE Logistics  |  |
| 117 | SERT Order No. PO-010197 (\$18,178,796.27)   Lemoine CDE Logistics   |  |
| 118 | SERT Order No. PO-010195 (\$2,905,740)   TNT Transportation  |  |
| 119 | SERT Order No. PO-010196 (\$2,248,540)   IRG Global Emergency  |  |
| 120 | SERT Order No. PO-010307 (\$259,012)   Will-Burt Integration & Elevation   |  |
| 121 | SERT Order No. PO-010306 (\$499,869.60)   Baker's Communications   |  |
| 122 | SERT Order No. PO-010305 (\$245,141.04)   Williams Communications  |  |
| 123 | SERT Order No. PO-010304 (\$27,865)   Motorola Solutions, Inc.   |  |
| 124 | SERT Order No. PO-010303 (\$2,192)   Motorola Solutions, Inc.  |  |
| 125 | SERT Order No. PO-010302 (\$128,132.40)   CDW Government LLC   |  |
| 126 | SERT Order No. PO-010326 (\$36,848,875)   LTS, Inc.  |  |
| 127 | Photo of black temporary silt fencing - 2025-07-25   |  |
| 128 | FDHSMV Facebook Post, April 9, 2025<br><a href="https://www.facebook.com/FLHSMV/posts/today-the-florida-highway-patrol-reaches-a-new-milestone-as-executive-director-d/1065884665572211/">https://www.facebook.com/FLHSMV/posts/today-the-florida-highway-patrol-reaches-a-new-milestone-as-executive-director-d/1065884665572211/</a> |  |
| 129 | Miami Herald , <i>Exclusive: Hundreds at Alligator Alcatraz Have No Criminal Charges</i> , Miami Herald Learns, July 3, 2025,<br><a href="https://www.miamiherald.com/news/local/immigration/article310541810.html">https://www.miamiherald.com/news/local/immigration/article310541810.html</a>                                       |  |
| 130 | Miami Herald, <i>Is your family member or client at Alligator Alcatraz? We obtained a list</i> ,<br><a href="https://www.miamiherald.com/news/local/immigration/article310541770.html#storylink=cpy">https://www.miamiherald.com/news/local/immigration/article310541770.html#storylink=cpy</a>  |  |
| 131 | Outside Everglades Detention Center by Carrie Feit Portraits   |  |
| 132 | Carrie Feit Photo Declaration  |  |
| 133 | LinkedIn page for Ian-Paul Gadea-Guidicelli, MPA, CEM, FPDM  |  |
| 134 | Homeland Security "Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain – Dormitory Construction at Immigration and Customs Enforcement Krome Service Processing Center – Miami, Florida  |  |
| 135 | Texts from Israel O. Herrera, ICE Assistant Field Officer to FDEM re Standards and Compliance Tour Scheduling.   |  |

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| 136 | Ralph Arwood - 08-08-2025 KTNT 06              |  |
| 137 | Ralph Arwood - 08-08-2025 KTNT 15              |  |
| 138 | Ralph Arwood -08-08-2025 KTNT 17               |  |
| 139 | Ralph Arwood - 08-08-2025 KTNT 82              |  |
| 140 | Ralph Arwood - 08-08-2025 KTNT 76              |  |
| 141 | Ralph Arwood - 08-08-2025 KTNT 79              |  |
| 142 | Ralph Arwood - 08-08-2025 KTNT 09              |  |
| 143 | 08.08.2025 Brian Mast letter to Jessica Namath |  |
| 144 | 08.08.2025 Declaration of Cooper Kass          |  |
| 145 | Ralph Arwood - 08-08-2025 KTNT (Video)         |  |

Dated: August 8, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 8, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

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